UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
v.	.)	Criminal No. 04-10293-JLT
)	
MARK F. MARCHESE,)	
FRANK R. BOWMAN, JR.,)	
ANTHONY P. RAYMOND,)	
Defendants.)	
)	

JOINT MEMORANDUM FOR FINAL STATUS CONFERENCE

(With regard to Defendant Bowman)

The parties submit this Joint Memorandum For Final Status Conference pursuant to Local Rule 116.5(C).

The parties hereby report that:

- 1. The government has provided and made available to the defendant all discovery. There are no outstanding discovery issues.
- 2. Neither of the parties anticipates providing additional discovery.
- 3. The defendant does not intend to raise a defense of insanity or public authority.
- 4. The government has not requested notice of alibi.
- 5. At this time, the defendant does not anticipate filing any motions requiring a ruling by the District Court before trial. The defendant, however, reserves the right to file such motions.
- 6. With regard to Defendant Bowman, the parties have discussed the possibility of an early resolution to the case and hereby request that the matter be forwarded to the District

Court for the setting of a date for a change of plea by Defendant Bowman.

7. The parties hereby agree to the periods already excluded by order of this Court.

Respectfully submitted,

Respectfully submitted,

MICHAEL J. SULLIVAN United States Attorney

By:

FRANK R. BOWMAN, JR.

Defendant

By:

Paul R. Moore

Assistant U.S. Attorney

(617)748-3654

Charles A. Clifford

Counsel for the Defendant

DATE:

January 11, 2005